

# **Building Blocks for Effective Housing Elements**

## **Adequate Sites Inventory and Analysis**

### **Analysis of Non-Vacant and Underutilized Sites**

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*The inventory sites that have potential for residential developed can include non-vacant and underutilized sites (Section 65583.2(b)(3)). The element must include an explanation of the methodology for determining the realistic buildout potential of these sites within the planning period (Section 65583.2(g)).*

#### **I. REQUISITE ANALYSIS**

Local governments with limited vacant land resources or with infill and reuse goals may rely on non-vacant and underutilized residential sites to accommodate the regional housing need. Examples include sites with potential for recycling, scattered sites suitable for assembly, publicly-owned surplus land, portions of blighted areas with abandoned or vacant buildings, areas with mixed-used potential, substandard or irregular lots which could be consolidated, and any other suitable underutilized land. Adopting policies to maximize existing land resources by promoting more compact development patterns or reuse of existing buildings also allows a local government to meet other important community objectives to preserve open space or agricultural resources as well as assist in meeting green house gas emission reduction goals.

If the inventory identifies non-vacant sites to address a portion of the regional housing need, the element must describe the additional realistic development potential within the planning period. The analysis must describe the methodology used to establish the development potential considering all of the following:

1) the extent existing uses may constitute an impediment to additional residential development; 2) development trends; 3) market conditions; and 4) availability of regulatory and/or other incentives such as expedited permit processing, and fee waivers or deferrals.

#### **1. Existing Uses:**

The element must demonstrate non-vacant and/or underutilized sites in the inventory that can be realistically developed with residential uses or more intensive residential uses at densities appropriate to accommodate the regional housing need (by income) within the planning period. The element must describe all existing uses (such as surplus school site, operating business, nursery, etc.)

and evaluate the extent these uses would constitute an impediment to new residential development. The condition or age of existing uses and the potential for such uses to be discontinued and replaced with housing (within the planning period) are important factors in determining “realistic” development potential. For example, an analysis might describe an identified site as being developed with a 1960’s strip commercial center with few tenants and, therefore, a good candidate for redevelopment, versus a site containing a newly opened retail center that is unlikely going to be available for residential development within the planning period.

## 2. Recent Development Trends:

The inventory analysis should describe recent development and/or redevelopment trends in the community. The element should also include a description of the local government’s track record and specific role in encouraging and facilitating redevelopment, adaptive reuse, or recycling to residential or more intense residential uses. If the local government does not have any examples of recent recycling or redevelopment, the housing element should describe current or planned efforts (via new program actions) to encourage and facilitate this type of development (e.g., providing incentives to encourage lot consolidation or assemblage to facilitate increased residential development capacity).

## 3. Market Conditions:

Housing market conditions also play a vital role in determining the feasibility or realistic potential of non-vacant sites and/or underutilized sites for residential development. The element should evaluate the impact of local market conditions on redevelopment or reuse strategies. For example, high land and construction costs, combined with a limited supply of available and developable land may indicate conditions “ripe” for more intensive compact and infill development, or redevelopment and reuse.

## 4. Availability of Regulatory and/or other Incentives:

The analysis should describe an existing or planned financial assistance or regulatory concessions or incentives to encourage and facilitate additional or more intense residential development on non-vacant and underutilized sites. Many local governments develop partnerships with prospective developers to assist in making redevelopment/reuse economically feasible. Examples of these incentives include: 1) organizing special marketing events geared towards the development community, 2) posting the sites inventory on the local government’s webpage, 3) identifying and targeting specific financial resources, and 4) reducing appropriate development standards.. Absent a track record or development trends to demonstrate the feasibility of a recycling or

redevelopment strategy, the housing element should describe existing or planned financial assistance or regulatory relief from development standards that will be provided to encourage and facilitate more intensive residential development on the identified underutilized sites.

## **KEY IDEAS**

### **II. HELPFUL HINTS:**

To demonstrate and quantify the residential development history of non-vacant and/or underutilized sites, local government could rely on its annual general plan progress reports pursuant to Government Code Section 65400. The project-by-project descriptions and resulting build-out yields could be used to demonstrate a track record for recycling and/or redevelopment of non-vacant and/or underutilized sites.

### **III. MODEL ANALYSES**

[Sample Sites Inventory](#)

### **IV. LINKS**

[HCD: Publications on Residential Infill and Related Development Issues 2006](#)

[HCD: Technical Assistance Memo on AB 2348 \(Mullin\), Statutes of 2004, Chapter 724](#)

[Non-Profit Housing Association of Northern California](#)

[Southern California Association of Non-Profit Housing](#)

[San Diego Housing Federation](#)

[California Building Industry Association](#)

[HUD's Regulatory Barriers Clearinghouse](#)

[Senate Infill Summary Report](#)

[California Infill Parcel Locator](#)

[Center for Community Innovation](#)

[Community Connections](#)

[Center for Land Recycling](#)